

1 Timothy K. Ford, WSBA #5986
2 Katherine C. Chamberlain, WSBA #40014
3 MacDonald Hoague & Bayless
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5 Seattle, Washington 98104-1745
6 (206) 622-1604

5 UNITED STATES DISTRICT COURT
6 EASTERN DISTRICT OF WASHINGTON AT SPOKANE

7 K.S. by her guardian ad litem Kenneth L.
8 Isserlis, and DOROTHY SPIOTTA and
9 PAUL SPIOTTA,

10 Plaintiffs,

11 v.

12 AMBASSADOR PROGRAMS, INC.,
13 AMBASSADORS GROUP, INC.,
14 PEOPLE TO PEOPLE
15 INTERNATIONAL,

16 Defendants.

17 No. CV-08-243-RMP

18 DECLARATION OF KATHERINE C.
19 CHAMBERLAIN IN SUPPORT OF
20 PLAINTIFFS' COST BILL FOR
21 RESPONDING TO
22 AMBASSADORS' MOTION FOR
23 PROTECTIVE ORDER

1 I, KATHERINE C. CHAMBERLAIN, on oath declare as follows:

2 1. I am one of Plaintiffs' attorneys in this case.

3 2. Tim Ford is a highly experienced civil and criminal trial lawyer. Since
4 his admission to the Washington Bar 35 years ago (in 1975), he has represented
5 clients before many state and federal trial and appellate panels, including the
6 Washington Supreme Court and the United States Supreme Court. His hourly rate is
7 \$450.

8 3. I have been a practicing attorney for over 5 years, including work
9 performed in Oregon from 2004-07 and Washington since then. My hourly rate is
10 \$250.

11 DECLARATION OF KATHERINE C. CHAMBERLAIN IN SUPPORT
12 OF PLAINTIFFS' COST BILL FOR RESPONDING TO
13 AMBASSADORS' MOTION FOR PROTECTIVE ORDER - 1

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15 MACDONALD HOAGUE & BAYLESS
16 705 Second Avenue, Suite 1500
17 Seattle, Washington 98104
18 Tel 206.622.1604 Fax 206.343.3961

1 4. Below is a summary of the attorney fees incurred in opposing
 2 Ambassadors' Motion for Protective Order Re: Plaintiffs' Rule 30(b)(6)
 3 Deposition Notice Re: Leaders. The summary includes the work performed by
 4 attorneys Timothy K. Ford and Katherine C. Chamberlain in preparing Plaintiffs'
 5 Responsive Memorandum, Dkt. 251. Both Mr. Ford and I recorded the time we
 6 spent on opposing this motion in our time-keeping program, Provantage. The
 7 summary of time spent is based on a Provantage report. The attorney fees are
 8 calculated by multiplying the time spent by each attorney and their hourly rate.

Date	Attorney	Rate	Hours	Description of Work Performed by Attorney	Amount
2/15/10	KCC	\$250	.30	Read Ambassador's Motion for Protective Order re: 30(b)(6) on leader discipline	75.00
3/1/10	TKF	\$450	.70	Research and draft response to motion for protective order re 30b6	315.00
3/2/10	TKF	\$450	1.00	Draft and research 30b6 response	450.00
3/3/10	KCC	\$250	.60	Read/edit brief in response/opposition to Ambassador's M. for Protective Order re 30(b)(6) dep on leader discipline; Email to TF re: same	150.00
3/3/10	TKF	\$450	1.70	Research and draft opposition to motion for protective order	765.00
3/4/10	TKF	\$450	3.50	Research and draft response to 30b6 motion	1,575.00
TOTAL			7.80		\$3,330.00

1 I swear under penalty of perjury under the laws of the United States that the
2 above is true to the best of my knowledge.

3 DATED this 26th day of April, 2010.

4 By 
5 _____
6 Katherine C. Chamberlain

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CERTIFICATE OF SERVICE

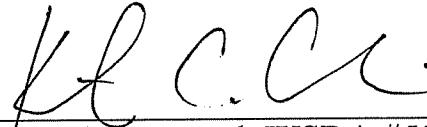
2 I hereby certify that on April 26, 2010, I electronically filed the foregoing
with the Clerk of the Court using the CM/ECF system which will send notification
3 of such filing to the following:

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- **Kenneth L Isserlis**
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- **James Bernard King**
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10 MACDONALD HOAGUE & BAYLESS

11 By 
12

13 Timothy K. Ford, WSBA #5986
Katherine C. Chamberlain, WSBA #40014
14 Attorneys for Plaintiffs
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